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7 **Attorneys for Plaintiff**

8 Japan Corporate News Network K.K.,  
9 a California Partnership  
10 dba Asia Corporate News Network

11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**

13  
14 **Japan Corporate News Network K.K., a**  
15 California Partnership, dba Asia  
16 Corporate News Network,

17 Plaintiffs,

18 vs.

19 **ACNNEWSWIRE.COM**, an Internet  
20 domain name;  
21 **ACNNEWSWIRE.ORG**, an Internet  
22 domain name;  
23 **ACNNEWSWIRE.NET**, an Internet  
24 domain name;  
25 **ACN-NEWSWIRE.COM**, an Internet  
26 domain name; and  
27 **ACN-NEWSWIRE.NET**, an Internet  
28 domain name,

Defendants.

Case No. C-07-05061-SI

**NOTICE OF SETTLEMENT;  
STIPULATED DISMISSAL OF  
COMPLAINT AND TRANSFER OF  
DOMAINS; [PROPOSED] ORDER**

1        WHEREAS, on October 1, 2007, Japan Corporate News Network K.K., a  
2 California Partnership, dba Asia Corporate News Network ("JCN") filed a Complaint (the  
3 "Complaint") against ACNNEWSWIRE.COM, an Internet domain name;  
4 ACNNEWSWIRE.ORG, an Internet domain name; ACNNEWSWIRE.NET, an Internet  
5 domain name; ACN-NEWSWIRE.COM, an Internet domain name; and ACN-  
6 NEWSWIRE.NET, an Internet domain name (collectively, the "ACN Domains");

7        WHEREAS, Timothy Mckinnon ("Mckinnon") is the registrant of record of the ACN  
8 Domains;

9        WHEREAS, the Registrar of the ACN Domains, Godaddy.com, Inc., has placed  
10 the ACN Domains on Registrar Lock and informed the Court via declaration dated  
11 October 3, 2007 that "the Domain Names should be construed to be under the dominion  
12 and control of the court until such time as GoDaddy.com, Inc. receives further instruction  
13 with regard to the Domain Names";

14        WHEREAS, Mckinnon and JCN have reached a settlement which includes a  
15 transfer of the ACN Domains, and a dismissal of the Complaint without prejudice;

16        WHEREAS, Mckinnon and JCN request that the Court give final direction to the  
17 Registrar, GoDaddy.com, Inc., as to the dominion and control of the ACN Domains which  
18 now reside with the Court;

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1 IT IS HEREBY STIPULATED AND AGREED by and between JCN and Mckinnon  
2 that:

3 (1) The ACN Domains shall be transferred to JCN, via its General Partner, Bruce  
4 Porter; and,  
5 (2) The Complaint shall be dismissed without prejudice.

6  
7 DATED: October 23, 2007  
8  
9  
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12

By: 

10 Timothy Mckinnon, Registrant of  
11 Record of the ACN Domains  
12

13 DATED: October 23, 2007  
14  
15

KRONENBERGER BURGOYNE, LLP

16 By: 

17 Karl S. Kronenberger  
18 Deepa Krishnan  
19 Attorneys for Plaintiff, Japan Corporate  
20 News Network K.K., a California  
21 Partnership, dba Asia Corporate News  
22 Network  
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**[PROPOSED] ORDER**

Based on the foregoing stipulation, and good cause appearing therefore, **IT IS  
HEREBY ORDERED** that:

(1) Godaddy.com, Inc. shall unlock the following Domains and transfer them to JCN, via its General Partner, Bruce Porter:

ACNNEWSWIRE.COM

ACNNEWSWIRE.ORG;

ACNNEWSWIRE.NET;

ACN-NEWSWIRE.COM;

ACN-NEWSWIRE.NET; and,

(2) This Action shall be dismissed without prejudice.

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2007

Susan Illston

Hon. Susan Illston  
United States District Judge

## PROOF OF SERVICE

I am a resident of the state of California, over the age of eighteen years and not a party to this action. My business address is 150 Post Street, Suite 520, San Francisco, California, 94108.

On October 23, 2007 I served the following document(s):

**1. NOTICE OF SETTLEMENT; STIPULATED DISMISSAL OF COMPLAINT  
AND TRANSFER OF DOMAINS; [PROPOSED] ORDER**

on the parties listed below as follows:

8	Timothy McKinnon
9	PO BOX Q1299
10	Queen Victoria Building
11	Sydney, New South Wales 1230
12	Australia <u>mckint@ecomm.net.au</u> <b>[Courtesy copy]</b>
	Diane E. Whiting
	Domain Services
	Godaddy.com, Inc.
	14455 N. Hayden Rd., Suite 219
	Scottsdale, AZ 85260
	<u>domaindisputes@godaddy.com</u>
	<b>[Courtesy copy]</b>

BY FIRST CLASS MAIL, by placing a true copy thereof in a sealed envelope, with postage thereon fully prepaid, for collection and mailing, in San Francisco, California, following ordinary business practices, which is deposited with the US Postal Service the same day as it is placed for processing.

BY EMAIL to the addresses listed above.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Roby Tan

Pete Touschner